

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

**Rebuttal Testimony of Robben Kniffen-Rusu
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 8.1

April 22, 2002

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REBUTTAL TESTIMONY OF ROBBEN KNIFFEN-RUSU

ON BEHALF OF AMERITECH ILLINOIS

I. INTRODUCTION AND PURPOSE OF REBUTTAL TESTIMONY

Q. Please state your name and business address.

A. My name is Robben Kniffen-Rusu. My business address is 100 East Big Beaver, Floor 13, Troy, Michigan 48083.

Q. Are you the same Robben Kniffen-Rusu that submitted Direct Testimony on January 28, 2002?

A. Yes, I am.

Q. What is the purpose of your Rebuttal Testimony?

A. The purpose of my Rebuttal Testimony is to respond to claims and proposals in this proceeding by XO Communications (“XO”) regarding white page directory listings.

XO raises five issues concerning listings: three relating to White Page (“WP”) listing update processes, discrepancies and verification; one relating to discrepancies between Directory Assistance (“DA”) and WP listing verification; and one relating to training. I will demonstrate that four of these issues are insignificant. The last issue -- one of the listing process issues -- is a source of concern and Ameritech Advertising Services (“AAS”) is actively addressing and correcting this issue.

24

25 **Q. Do you sponsor any schedules supporting your Rebuttal Testimony?**

26 A. Yes, I have attached one schedule:

27 • Kniffen-Rusu Rebuttal Schedule 1 - Listing Trouble Report Instructions.

28

29 **II. LISTING PROCESSES AND DISCREPANCIES**

30 **A. ACCURACY OF WP AND DA LISTINGS PROCESSED VIA ACES.**

31

32 **Q. On page 2 of her testimony, Ms. McCabe claims to have experienced problems**
33 **regarding the accuracy of White Page (“WP”) and Directory Assistance (“DA”)**
34 **listings for XO’s customers that it requests via the Ameritech Customer Entry**
35 **System (“ACES”). Can you first remind us what ACES is?**

36 A. As stated in my January 28, 2002 direct testimony, ACES is a PC-based data entry
37 system offered by AAS intended as a transitional mechanism for submitting listings prior
38 to the CLEC’s implementation of one of the Ameritech Illinois electronic interfaces, LSR
39 Exchange (“Enhanced LEX”) or Electronic Data Interchange (“EDI”). The Affidavit of
40 Mark Cottrell describes these interfaces in greater detail.

41

42 **Q. Has AAS performed a root cause analysis of XO’s listings transmitted via ACES to**
43 **determine the source of XO’s alleged problems?**

44 A. Yes. AAS began a CLEC listing order processing review and root cause analysis in
45 January of 2002. By March 22, 2002 AAS completed its review and analysis of XO’s
46 listings transmitted via ACES and identified that the root cause of the problem was XO,

47 which had mistakenly submitted nearly 100 duplicate listings. On March 28, 2002 AAS
48 notified XO that the duplicate listing problem had been identified as the source of the
49 problem and sent XO a list of the duplicate listings for review and clean up. On April 1,
50 2002 an XO representative informed AAS that XO's *provisioning group* was using the
51 "retain listing as is" function of the Local Number Portability ordering process (described
52 in paragraph 10 of my Affidavit), while at the same time XO's *directory listing group*
53 was sending the same listings via ACES. This dual activity generated duplicate listings
54 in the databases and was the source of XO's problems. AAS and XO are working
55 cooperatively to address these duplicate listings and to prevent a future occurrence of this
56 and similar problems.

57
58 **Q. On page 2 and again on page 5 of her testimony, Ms. McCabe describes a**
59 **notification/query process for errors on listing orders submitted by XO via ACES.**
60 **Please explain this process.**

61 A. CLECs who order their end user listings via ACES receive a file via AAS' CLEC
62 Website, TCListLink, containing a reject or a confirmation for each order submitted. The
63 confirmation indicates that the order received has passed a series of edit checks and that a
64 service order can successfully be created for processing into the WP listing database.
65 After processing this listing service order into the WP database, it is possible that AAS
66 may detect a problem or discrepancy on a particular listing, such as the existence of a
67 duplicate listing or the absence of one of the listings the service order is attempting to
68 update. (Note: a single service order can update multiple listings and it is possible that

only one listing on the service order can encounter a database level problem.) In these situations, AAS' process is to complete a CLEC Reject Notification form and fax it to the CLEC to facilitate correction of the problem.

Q. Although XO was the one making the mistakes by submitting duplicate listings, should AAS have notified XO of the duplicate listings at the time they were detected in the WP database?

A. Yes. AAS' root cause analysis indicated that the personnel responsible for reviewing Illinois listings were not properly following the CLEC Reject Notification process for listing database discrepancies and thus had not notified XO of the duplicate listings they had submitted. Upon identifying this internal process oversight, AAS retrained the personnel responsible for Illinois listings on the CLEC Reject Notification process. This training was completed as of March 28, 2002. Additionally, AAS implemented an audit process to insure continued execution of this process. XO will be receiving CLEC Reject Notification forms per the documented process in the future.

AAS' response to this issue shows that it takes such process issues seriously and is willing to consider and implement improvements to its systems.

Q. To put the problem of duplicate listings in perspective, what is the actual discrepancy rate for the transmission of XO's listings via ACES to AAS for the updating of Ameritech Illinois' WP and DA databases?

90 A. AAS' records show that the issue is not as significant as XO claims it to be. From
91 September 1, 2001 to March 31, 2002, of all the XO Illinois listing transactions AAS
92 accepted via ACES, over 90% were electronically updated in the WP publishing database
93 and forwarded to DA for updating, all within 24 hours. AAS manually completed the
94 remaining orders. It is with these remaining orders, which did not flow through
95 electronically and must be completed manually, that the potential exists for a problem to
96 be detected that would require AAS to submit a CLEC Reject Notification form to XO as
97 described in the previous paragraph.

98
99 **Q. XO recommends that Ameritech Illinois provide a faster confirmation process. Is a**
100 **faster electronic listing ordering and confirmation process available to CLECs?**

101 A. Yes. CLECs that submit their end user listing information via Ameritech Illinois'
102 Enhanced LEX or EDI interfaces will receive a Firm Order Confirmation ("FOC") (or a
103 rejection notice if the submission is incomplete or improper) on a real-time basis.
104 Ameritech Illinois' LEX and EDI operating support systems can be used by all CLECs,
105 including XO, to submit directory listing updates. Again, ACES is not meant to be a full
106 or long-term electronic interface; it is simply a transitional tool to be used while the
107 CLEC implements LEX or EDI.

108
109 **B. LISTING TROUBLE REPORT PROCESS.**
110

111 **Q. Is the Listing Trouble Report (LTR) process described accurately on page 4 of XO**
112 **Witness Tara McCabe's testimony?**

A. No. Ms. McCabe says that the trouble report process can only be used if a listing actually makes it into the DA database. This is not at all correct. The trouble report process is for all types of problems. In particular, AAS instructs CLECs to submit a Listing Trouble Report (LTR) to AAS for *all* problems or discrepancies they find associated with the listings of their customers, including DA, TCListLink, or other concerns. This information is clearly spelled out in the Listing Trouble Instructions posted on Ameritech Illinois' CLEC Online Handbook website as well as AAS' enhanced TCListLink website. An excerpt of the instructions is provided below and the entire instruction document is attached as Schedule 1.

I. WHEN TO USE

A Listing Trouble Report is used to report a discrepancy on a customer's listing. Examples of discrepancies include:

- (1) After 48 hours of order submission, you have not received a manual or mechanized confirmation report, nor have you received a TC Reject Notification, and your listing is not in Directory Assistance (DA) or TCListLink;**
- (2) You received a confirmation report, yet the listing does not reflect your order or appears incorrectly in TCListLink or Directory Assistance.**
- (3) Your listing appears incorrectly on a Pre-BOC report.**

On three separate occasions between September 2001 and March 2002, AAS representatives retrained, via the telephone, four different XO representatives on this LTR process.

C. TCLISTLINK AND DA LISTING VERIFICATION.

Q. On pages 3, 4 & and 6 of her testimony Ms. McCabe alleges XO has experienced problems with TCListLink. Can you first remind us what TCListLink is?

143 A. As stated in my January 28, 2002 direct testimony, TCListLink is a password-protected
144 website, provided by AAS, with an easy-to-use graphical user interface that, among other
145 functions, allows CLECs to review and verify their end-user's WP listing data. The
146 listing data available via TCListLink is updated from the WP database in a nightly batch
147 listing update process. TCListLink is the same listing verification tool that AAS provides
148 to Ameritech Illinois' retail operations.

149
150 **Q. Is Ms. McCabe correct when she says on page 6 that TCListLink reflects listings in**
151 **the DA database but not the WP database?**

152 A. No. The WP listing database feeds listing updates to TCListLink simultaneously with the
153 DA database. Therefore, other than the rare temporary exceptions outlined in my January
154 28, 2002 direct testimony (two timing issues and one non-Ameritech DA provider issue),
155 TCListLink is effectively a single tool concurrently reflecting the end-user's WP and DA
156 listing data.

157
158 **Q. Is there a three (3) day delay before a CLEC can verify its listing, as Ms. McCabe**
159 **suggests at page 3 of her testimony?**

160 A. No. Ms. McCabe describes this delay as consisting of "24 hours to receive ACES
161 confirmation that listing order was transmitted properly and 48 hours from that time to
162 provide for the update to the White Page and Directory Assistance databases." This
163 statement is incorrect. As outlined above, AAS instructs CLECs to submit a Listing
164 Trouble Report ("LTR") to AAS if they find inaccurate or unavailable listing data from

Ameritech Illinois' DA or TCListLink 48 hours or two (2) business days after *submission* of the listing order, not 48 hours after the CLEC has *received the confirmation*. Typically, both DA and TCListLink are updated within 24 hours after the submission of the listing. Therefore, in most cases, CLECs are able to verify their listing the next business day after it is submitted. CLECs are instructed to wait the additional day before reporting a discrepancy to allow for those occasions where a technical problem may have delayed the DA or TCListLink update process. It is true that my Direct Testimony states that "The listing information on TC Listing Link is current as of three (3) business days after Ameritech advertising services' receipt of a correct listing order." This was, at the time, the language that was posted directly on the TCListLink website listing inquiry screen. AAS recognizes that this information conflicts with the actual, shorter intervals that apply to the process. The notice posted on the TCListLink website listing inquiry screen has been corrected to reflect the shorter two (2) business day interval.

Q. In Ms. McCabe's testimony, XO claims to have experienced problems with the accuracy of its customer's listings in Ameritech Illinois' DA and TCListLink. Has XO documented these issues and submitted these problems to AAS for resolution?

A. As outlined above, AAS instructs CLECs to submit a Listing Trouble Report ("LTR") to AAS if they find inaccurate or unavailable listing data from Ameritech Illinois' DA or TCListLink two (2) days after *submission* of the listing order. From September 2001 through March 2002, AAS received less than 25 Listing Trouble Reports from XO documenting problems with their Illinois listings on DA or TCListLink. AAS' commitment is that Listing Trouble Reports are investigated and responded to within 24

hours or one (1) business day. When, in response to a Listing Trouble Report, AAS' must take action and correct a listing, the corrected listing is forwarded to TCListLink and the DA database within 24 to 48 hours (1 - 2 business days) from the receipt of the Listing Trouble Report. If the problem remains after the Listing Trouble Report update is forwarded to DA, the CLEC escalates the Listing Trouble Report to a DA CLEC Specialist for resolution directly in the DA database. From September 2001 to March 2002, XO did not escalate any DA-related Listing Trouble Reports to the DA CLEC Specialist. From this absence of escalation I conclude that whatever problems XO experienced were quickly resolved.

III. LISTING TRAINING

Q. Ms. McCabe complains that AAS has not been provided adequate training.

(McCabe, pp. 6-7) Has AAS provided Directory Listing processing training to XO?

A. Yes. AAS has provided Directory Listing processing training at XO's various offices seven times in the past:

- September 1999
- December 1998
- October 1998
- August 1998
- April 1998
- December 1997
- April 1997

Additionally, AAS provided copies of its 30-minute refresher training video to two different XO offices in December 2001 and January 2002.

214 **Q. Is additional training available to XO?**

215 A. Yes. As described in my Affidavit, AAS offers a listing workshop to all switched-based
216 CLECs. This training workshop is available to switched-based CLECs at anytime; they
217 simply need to request the training via AAS' CLEC Hotline. On January 23, 2002 and
218 again on March 28, 2002, AAS proactively suggested to an XO representative that it
219 schedule a Directory Listing training session. To date, XO has not accepted this offer for
220 additional training.

221
222 **Q. Has AAS provided on-going training support to XO?**

223 A. Yes. XO is a regular user of the enhanced Directory Listing CLEC Hotline service that
224 AAS offers CLECs. Since January 2001, XO has contacted AAS' CLEC Hotline over
225 forty times. More than half of these hotline contacts resulted in AAS providing XO
226 representatives with specific directory listing training, immediately, over the telephone.

227
228 **Q. Does Ameritech Illinois offer a Directory Listing training workshop to CLECs who**
229 **elect to utilize Ameritech's EDI interface?**

230 A. Yes. As described in my Affidavit, switched-based CLECs who have elected to utilize
231 the option of requesting a LSR and a Directory Service Request ("DSR") using
232 Ameritech Illinois' Electronic Data Interchange ("EDI") interface are welcome to attend
233 a two-day workshop on how to complete the LSR and DSR forms and properly format
234 directory listings. Any switched-based CLEC wanting to register for one of these
235 workshops can do so via the on-line registration system available via the CLEC Online
236 website <<https://clec.sbc.com>>.

237

238 **IV. CUSTOMER RAMIFICATIONS AND WHITE PAGE DIRECTORY**
239 **ACCURACY.**
240

241 **Q. XO voices a concern that an end user's White Page Directory listing will be affected**
242 **if a listing does not immediately appear in the WP database. Do CLECs have**
243 **additional listing verification options available prior to a publication of a WP**
244 **Directory?**

245 A. Yes. As stated in my Affidavit, prior to the publication of a directory, Ameritech Illinois
246 offers CLECs the option of receiving two pre-Business Office Close (pre-BOC) white
247 page verification review reports. Ameritech provides the first pre-BOC report to
248 requesting CLECs at no charge 45 calendar days in advance of the directory close date.
249 The second pre-BOC report, if requested, is provided 15 calendar days in advance of
250 directory close. Thus, there is ample opportunity for CLECs to verify the accuracy of the
251 WP database well in advance of the publication dates for the directories.

252

253 **Q. Is AAS committed to maintaining the accuracy and completeness of the listings in its**
254 **White Page directories?**

255 A. Absolutely. AAS wants all end users, regardless of their service provider, to obtain value
256 from all of its products, including WP directories. These products provide the greatest
257 value to all end users when they contain complete and accurate listing information. I
258 believe that the efforts I have described in this testimony, and in my Affidavit and Direct
259 Testimony, demonstrate this concern.

260

V. CONCLUSION

Q: Please summarize your testimony.

A: I have demonstrated: (1) that root cause analysis of CLEC order processing done by AAS has identified both XO and AAS process difficulties that resulted in some listing errors that the companies are working together to resolve; (2) that AAS does successfully and accurately process a high percentage of XO's listing updates; (3) that the Listing Trouble Report process is applicable for any listing discrepancy a CLEC identifies; (4) that XO is able to verify its WP and DA listings on a timely basis with accuracy; and (5) that AAS has provided significant directory listing training to XO.

Q. Do the issues raised by Ms. McCabe cause you to change your conclusion that Ameritech Illinois (1) provides nondiscriminatory appearance and integration of white page directory listings to CLEC's end users and (2) provides white pages listings for CLEC's end users with the same accuracy and reliability this it provides to its own customers, and thereby satisfies the requirements of checklist item #8?

A. Absolutely not. To the contrary, the fact that under the existing processes AAS has already addressed the issue concerning error notifications demonstrates that the existing process is working as it should.

Q. Does this conclude your Rebuttal Testimony?

A. Yes.